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September 18, 2020

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Rulemaking Proceeding for the Purpose of Promulgating a Regulation
to Help Prevent the Potential for Misleading Advertisements by
Prohibiting the Sale of Customer Data by Regulated Utilities Absent a
Customer's Direct Consent (See Commission Order No. 2019-877)
Docket No. 2019-387-A

Dear Ms. Boyd:

At the public virtual hearing in the above-referenced docket Commissioner Ervin requested that Dominion Energy South Carolina, Inc. ("DESC" or "Company") inform the Public Service Commission of South Carolina ("Commission") of the cost to provide a written copy of its privacy notice to every electric and natural gas customer by bill insert and by special mailing. Commissioner Ervin also requested that DESC provide the Commission with the total number of DESC customers who receive their bill statements electronically.

As an initial matter, DESC's privacy notice is available on its website today at <https://www.dominionenergy.com/privacy>, and it may be accessed by anyone at any time.¹ Additionally, when DESC communicates with its customers by email for billing purposes or for customer education and awareness purposes, the Company provides a hyperlink to its privacy notice in those communications. In other words, every time the Company sends an email to its customers, whether it is for billing purposes or providing information about programs such as "South Carolina 811 Call Before You Dig", direct access to the Company's privacy notice is also provided to the

¹ A copy of the Company's privacy notice may also be found in the Commission's administrative file in Docket Nos. 2019-363-E and 2019-386-E.

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customer.² For these customers, they can simply click on the link embedded in the email and access the Company's privacy notice.

Turning to Commissioner Ervin's specific question, if the Commission required DESC to provide by mail a written copy of its privacy notice to every electric and natural gas customer as a bill insert, then the Company estimates the cost of compliance to be approximately \$4,200 annually. Please note that this pricing information is based upon the typical DESC bill insert which is printed on one page using 3½ inch x 7 inch paper. Due to the amount of information contained in the privacy notice it is unlikely that the Company's privacy notice can be reduced to the customary bill insert size without adversely impacting its readability; therefore, additional cost for materials will likely be incurred because the privacy notice would need to be printed on more than one bill insert page.

A special mailing, on the other hand, is much more expensive than a bill insert. If a special mailing is required, then DESC estimates the cost to be approximately \$335,000 annually. A special mailing is typically printed on 8½ inch x 11 inch paper and furnished as a tri-fold mailer. Separate postage, which is provided through a bulk rate, is required for each piece of mail.

As for Commissioner Ervin's remaining question, the total number of DESC's electric and natural gas customers who receive their bill statement electronically is 305,889. This amount represents 34.8% of DESC's total amount of electric and natural gas customers, which is 878,449.

As the Company stated at the public hearing in this matter, the cost of complying with the proposed regulation would be a cost borne by customers. The Company does not believe that it is necessary for its customers to incur this additional expense because its privacy notice is already available to its customers as described above. Also, a copy of the policy may be obtained by calling the Company's customer service number of 1-800-251-7234. If, however, the Commission concludes that additional communication with its customers regarding its privacy notice is necessary, then DESC has the ability to publish on-bill messages on its billing statements and is willing to publish on its statements one-time annually that its privacy notice is available on its website at <https://www.dominionenergy.com/privacy>.

² Approximately 82% of DESC's customers have provided the Company with an email address; therefore, not every customer receives an email communication from DESC. Additionally, for those customers who have provided an email address some have opted-out of receiving certain communications from the Company.

If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,



K. Chad Burgess

KCB/kms

cc: All Parties of Record
(all via electronic mail only)